

EXHIBIT B

Comerica Branch/ATM Locator Infringes U.S. Pat. No. 6,091,956

This document shows where the Comerica Bank (“Comerica”) Branch/ATM Locator (http://campaign.comerica.com/local?utm_source=comerica-com, visited on June 19, 2011) infringes claim 11 of U.S. Pat. No. 6,091,956. This chart is preliminary, and LBSI expects to supplement the chart once discovery has been obtained from Comerica. LBSI expects this supplement to establish that the inferences contained in this preliminary chart are correct.

Comerica also provides a software application, the “Comerica Mobile Banking,” for mobile communication devices which provides a Branch/ATM Locator with, presumably, substantially similar functionality to the Comerica Branch/ATM Locator. LBSI expects to supplement its infringement contentions with respect to the Comerica Mobile Banking application once discovery has been obtained.

Reservation of Rights: Based on currently available information, LBSI believes that the Comerica Branch/ATM Locator and the Comerica Mobile Banking application literally infringe at least claim 11 of U.S. Pat. No. 6,091,956. LBSI expressly reserves the right to amend its infringement contentions as to Comerica to include claims of infringement of other claims of U.S. Pat. No. 6,091,956 and/or claims of infringement under the doctrine of equivalents once discovery has been obtained and/or once the Court has construed the terms of the claims of the asserted patent.

U.S. 6,091,956	Comerica Branch/ATM Locator
11. A method of communicatively executing, including making apparent to the aural and tactile senses of the user, one or more transmittable mappable hypertext items representing people, organisms, and objects, including buildings, roads, vehicles, and signs, on a computer in a manner scalably representing	<p>LBSI contends that the preamble is not a limitation. In the event the preamble, or portions thereof, is found to be a limitation on the claim, the Comerica Branch/ATM Locator performs the limitations of the preamble.</p> <p>The Comerica Branch/ATM Locator communicates transmittable hypertext items representing objects (e.g., Banking Centers, 24-hour ATMs, and Drive-throughs) to users. The locations are shown on scaled maps that show the relative position of these locations with respect to a location specified by the user. <i>See, e.g.</i>, the following screenshot showing various mapped locations.</p>

interrelationships of said objects, comprising the steps of:

Get the services you need at Comerica. | Comerica - Windows Internet Explorer provided by Yahoo!

File Edit View Favorites Tools Help

Favorites Get the services you need at Comerica. | Comerica

Home Feeds (J)

Comerica near: plano tx Enter city and state or ZIP code

Filter locations: All locations FIND LOCATIONS

A Parker-Premier
3310 Premier Road
(972) 422-7102

B Campbell-Central
910 E. Campbell Road
(214) 570-7990

C Richardson-Belt Line
1201 E. Beltline Road
(469) 330-3900

D Garland-Naaman Forest
4950 N Garland Ave
(972) 495-0645

E Preston Rd-Mapleshade
19176 Preston Rd
(469) 467-9536

1 of 10 >>

Map Satellite

General ATM Hours Manager

Comerica Bank
Parker-Premier
3310 Premier Road
Plano, TX 75023
Phone: (972) 422-7102
Fax: (972) 424-3879

Customer service: (800) 925-2160
Full Service, Drive Through
Directions to here

Save a tree with Comerica eStatements
Say goodbye to printed statements
by receiving eStatements through

Reward yourself when you spend
Sign up for Comerica EZ PerksSM
and earn rewards points for

Done

start Internet 100% 9:31 PM

Get the services you ... GameStop Comerica (2-24-2011... 9:31 PM

a. searching each The Comerica Branch/ATM Locator performs the step of "searching each of one or more unique mappable information code sequences, each

<p>of one or more unique mappable information code sequences, each of which said code sequences serving to uniquely represent one of said items and copied from the memory of said computer or received from an alternate source, for a field containing geographical coordinates, said each of said code sequences includes an item reference field, a name field, a location field including said geographical coordinates, and a data field,</p>	<p>of which said code sequences serving to uniquely represent one of said items and copied from the memory of said computer or received from an alternate source, for a field containing geographical coordinates, said each of said code sequences includes an item reference field, a name field, a location field including said geographical coordinates, and a data field."</p> <p>When the user enters search criteria (e.g., a city and state or a zip code, and optionally a type of location) and clicks the "FIND LOCATIONS" button, a database of unique mappable information code sequences is searched based on the user-entered search criteria. The user-entered search criteria in this example are Comerica locations near "Plano TX". Each entry in this database of locations is a unique mappable information code sequence, because each entry contains information about the Comerica location to which it corresponds, including geographical coordinates, which allows the Comerica location to be shown on the map. LBSI believes the Comerica Branch/ATM Locator searches a database of unique mappable information code sequences corresponding to Comerica locations.</p> <p>The publicly-available code for the Comerica Branch/ATM Locator shows that it contains a number of elements that are populated with information about particular Comerica locations. An example entry from the map for one of the Comerica locations identified in the map above is excerpted below.</p> <pre>Comerica Bank\u003cb\u002f\u003eParker-Premier \u003c\u002fd\u003e\u000a \u003cd\u003e class=\u0022address\u0022\u003e\u003cd\u003e class=\u0022location vcard\u0022\u003e\u003cd\u003e class=\u0022adr\u0022\u003e\u000a\u003cspan class=\u0022fn\u0022\u003e\u003cspan\u003cspan\u003e\u000a\u003cd\u003e class=\u0022street- address\u0022\u003e3310 Premier Road\u003c\u002fd\u003e\u003e\u000a\u003cspan class=\u0022locality\u0022\u003ePlano\u003c\u002fd\u003e\u003e, \u003cspan class=\u0022region\u0022\u003eTX\u003c\u002fd\u003e\u003e \u003cspan class=\u0022postal- code\u0022\u003e75023\u003c\u002fd\u003e\u003e\u003e\u003cd\u003e class=\u0022country-name\u0022\u003eUnited States\u003c\u002fd\u003e\u003e\u000a\u003cspan class=\u0022geo\u0022\u0022\u003e\u003cabbr class=\u0022latitude\u0022 title=\u002233.041067\u0022\u003e33° 2\u0022\u0022 27.8412\u0022 N\u003c\u002fd\u003e\u003e, \u003cspan class=\u0022longitude\u0022 title=\u0022- 96.706963\u0022\u003e96° 42\u0022\u0022 25.0668\u0022 W\u003c\u002fd\u003e\u003e\u003cspan\u003e\u000a\u003cspan\u003e\u000a\u003cd\u003e class=\u0022map-link\u0022\u003e\u000a \u003cd\u003e\u002fd\u003e\u003e\u000a\u003cd\u003e\u002fd\u003e\u003e\u000a \u003cd\u003e class=\u0022phone\u0022\u003e\u000a \u003cspan class=\u0022phone\u0022\u003e\u000a \u003cspan class=\u0022ext\u0022\u003e(972) 422-7102 \u003cd\u003e class=\u0022fax\u0022\u003e\u000a \u003cspan class=\u0022ext\u0022\u003e(972) 424-3879 \u003cd\u003e class=\u0022customer-service\u0022\u003e\u000a \u003cspan class=\u0022ext\u0022\u003e(800) 925-2160 \u003cd\u003e class=\u0022branch-type\u0022\u003eFull Service, Drive Through\u003c\u002fd\u003e\u003e\u000a \u003cd\u003e class=\u0022gmap-directions\u0022\u003e\u000a \u003ca href=\u0022http://maps.google.com/maps?daddr=3310%20Premier%20Road%20Plano%20 0TX%2075023\u0022 target=\u0022blank\u0022\u003eDirections to here\u003c\u002fa\u003e\u000a </pre>
---	--

```

\u003c\u002fdiv\u003e\u000a          \u003cdiv class=\u0022gmap-streetview\u0022\u003e\u000a
\u003ca href=\u0022javascript:void(0); \u0022\u003eStreet view\u003c\u002fa\u003e\u000a
\u003c\u002fdiv\u003e\u000a          \u003c\u002fdiv\u003e\u000a          \u003cdiv
id=\u0022atm\u0022\u003e\u000a          \u003cdiv class=\u0022atm-
functionality\u0022\u003e\u000a          \u003cstrong\u003eATM
Functionality:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u000a          Full Service Drive-Up
\u003c\u002fdiv\u003e\u000a          \u003cdiv class=\u0022atm-
availability\u0022\u003e\u000a          \u003cstrong\u003eATM
Availability:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u000a          24 hours a day 7 days a
week          \u003c\u002fdiv\u003e\u000a          \u003cdiv class=\u0022atm-
location-type\u0022\u003e\u000a          \u003cstrong\u003eLocation
Type:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u000a          Branch
\u003c\u002fdiv\u003e\u000a          \u003c\u002fdiv\u003e\u000a          \u003cdiv
id=\u0022hours\u0022\u003e\u000a          \u003cdiv class=\u0022branch-
hours\u0022\u003e\u000a          \u003cstrong\u003eBanking Center
Hours:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u000a          M-TH 9:00 - 4:00, F 9:00 -
6:00, SA 9:00 - 12:00          \u003c\u002fdiv\u003e\u000a          \u003cdiv
class=\u0022drivein-hours\u0022\u003e\u000a          \u003cstrong\u003eDrive-in
Hours:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u000a          M-F 7:30 - 6:00, S 9:00 - 12:00
\u003c\u002fdiv\u003e\u000a          \u003c\u002fdiv\u003e\u000a          \u003cdiv
id=\u0022manager\u0022\u003e\u000a          \u003cdiv class=\u0022manager-
name\u0022\u003e\u000a
\u003cstrong\u003eManager:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u000a          Molly
Toombs          \u003c\u002fdiv\u003e\u000a          \u003cdiv class=\u0022manager-
phone\u0022\u003e\u000a          \u003cstrong\u003eManager
Phone:\u003c\u002fstrong\u003e\u003cbr\u002f\u003e\u000a          (972) 422-7102
\u003c\u002fdiv\u003e\u000a          \u003c\u002fdiv\u003e\u000a
\u003c\u002fdiv\u003e\u000a\u003c\u002fdiv\u003e\u000a\u003c\u002fdiv\u003e\u000a\u003c\u002fdiv\u003e\u000a, "opts": { "title": "", "highlight": 0, "highlightcolor": "#FF0000" }, "nid": "1002" }, { "latitude": 32.974706, "longitude": -96.709304, "markername": "comerica", "offset": 1,

```

This example shows that a database entry for a location contains, “an item reference field, a name field, a location field including said geographical coordinates, and a data field.” The following list identifies exemplars for each of these fields:

- An item reference field: Presumably, each location includes an identifier, e.g., a database record number, a location number, etc. Each location also includes a unique value for the variable “nid”, e.g., for the Parker-Premier location “nid=1002”
- A name field: Parker-Premier
- A location field including said geographical coordinates: class=\u0022latitude\u0022 title=\u002233.041067\u0022\u003e33° 2\u002227.8412\u0022 N\u003c\u002fabbr\u003e, \u003cabbr class=\u0022longitude\u0022 title=\u0022-96.706963\u0022\u003e96° 42\u002227 25.0668\u0022
- A data field: e.g., address, phone number, ATM functionality/availability, location hours, manager

	<p>The Comerica Branch/ATM Locator presumably runs a search by comparing the user-entered search criteria to geographical locations of Comerica locations in a database to identify the Comerica locations geographically closest to the user-entered search criteria.</p>
<p>b. converting said coordinates to an appropriately proportionate representation on said computer, and</p>	<p>The Comerica Branch/ATM Locator performs the step of "converting said coordinates to an appropriately proportionate representation on said computer."</p> <p>The Comerica Branch/ATM Locator returns a map according to a predetermined zoom level. The Comerica Branch/ATM Locator also returns a map according to a predetermined size. For example, the exemplary code below defines the map zoom level and size:</p> <pre>{ "auto1map": { "width": "100%", "height": "450px", "zoom": 4, "maxzoom": "14",</pre> <p>Based on the layout of the Comerica Branch/ATM Locator, the zoom level and size each provide for the display of an appropriately proportionate representation.</p>
<p>c. displaying selectively scalably said items on said computer whereby said user may quickly receive and display timely situation information mapped in the context of spatial information, including appropriate to a geographical or other area, in which said mappable hypertext items are quickly received, mapped, and optionally executable selected by said user to provide additional of said situation information or received, stored, and transmitted by a provider of said situation information.</p>	<p>The Comerica Branch/ATM Locator performs the step of "displaying selectively scalably said items on said computer whereby said user may quickly receive and display timely situation information mapped in the context of spatial information, including appropriate to a geographical or other area, in which said mappable hypertext items are quickly received, mapped, and optionally executable selected by said user to provide additional of said situation information or received, stored, and transmitted by a provider of said situation information."</p> <p>The Comerica Branch/ATM Locator displays a map image based on the user-entered search criteria. The scale (or zoom) of the map is initialized to a predetermined value, but a different scale map be selected by the user. For example, a different scale may be performed by selecting the "+" or "-" symbols displayed on the left side of the map. Selecting the "+" symbol results in zooming in on the displayed map, whereas selecting the "-" symbol results in zooming out of the displayed map.</p> <p>The map image displays hypertext items corresponding to the user-entered search criteria. Identification of locations based upon the user-entered search criteria constitutes timely situation information, as the locations displayed are presumably current and/or the locations are geographically relevant (e.g., closest in distance amongst all of the locations) to the user-entered search criteria. Further, each of the locations is displayed on a map, and are thus, "mapped in the context of spatial information, including appropriate to a geographical or other area."</p> <p>The mappable hypertext items, e.g., the markers representing the locations, are received, mapped and optionally executable to provide additional situation information. The markers are received and displayed on the map according to the coordinates associated with each location. Each marker may also be "optionally executable," because when the marker is clicked, an event (e.g., a JavaScript event) associated with the marker is executed, providing additional situation information (e.g., address, phone number, location type, directions, ATM functionality, ATM availability, location hours, drive-through hours, manager name and phone number, etc.) Accordingly, the "additional situation information" is the information displayed in response to clicking a given marker.</p>

mapped, and optionally executably selected by said user to provide additional of said situation information or received, stored, and transmitted by a provider of said situation information.

Get the services you need at Comerica. | Comerica - Windows Internet Explorer provided by Yahoo!

File Edit View Favorites Tools Help

★ Favorites Comerica

Home Feeds (1)

Comerica near: plano tx Enter city and state or ZIP code

Filter locations: All locations FIND LOCATIONS

A Parker-Premier
3310 Premier Road
(972) 422-7102

B Campbell-Central
910 E. Campbell Road
(214) 570-7990

C Richardson-Belt Line
1201 E. Beltline Road
(469) 330-3900

D Garland-Naaman Forest
4950 N Garland Ave
(972) 495-0645

E Preston Rd-Mapleshade
19176 Preston Rd
(469) 467-9536

1 of 10 >>

Map Satellite

General ATM Hours Manager

Comerica Bank
Parker-Premier
3310 Premier Road
Plano, TX 75023
Phone: (972) 422-7102
Fax: (972) 424-3879

Customer service: (800) 925-2160
Full Service, Drive Through
[Directions to here](#)

Comerica Bank building image

Map data ©2011 Google - Terms of Use

Save a tree with Comerica eStatements
Say goodbye to printed statements by receiving eStatements through

Reward yourself when you spend
Sign up for Comerica EZ PerksSM and earn rewards points for

Done

start Internet 100% 9:31 PM

Get the services you ... GameStop Comerica (2-24-2011... 9:31 PM